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4	NTrue@lewisroca.com	
5	Attorneys for Defendant	
6		
7	UNITED STATES DISTRICT COURT	
8	DISTRICT OF NEVADA	
9	JANIS REDA, an individual,	CASE NO. 2:22-cv-00974-CDS-VCF
10	Plaintiff,	JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO FILE
11	V.	RESPONSE TO PLAINTIFF'S OPENING
12	UNUM LIFE INSURANCE COMPANY OF	BRIEF (ECF NO. 30) AND PLAINTIFF TO FILE REPLY
13	AMERICA, a foreign corporation; DOE INDIVIDUALS 1-10; ROE CORPORATIONS 1-10,	(SECOND REQUEST)
14 15	Defendants.	
		•

The parties jointly move to extend the deadlines for (1) Defendant to file its Answering Brief in response to Plaintiff's Opening Brief, and (2) Plaintiff to file the Reply in support of her Opening Brief. This is Defendant's second request for an extension and Plaintiff's first request for an extension.

Defendant's Answering Brief is currently due on June 28, 2024. Defendant requests this extension due to unanticipated demands on undersigned counsel's schedule that have arisen from undersigned counsel's other pending matters (e.g., the service of two 30(b)(6) notices of deposition on short notice, one of which has nearly 40 topics), which are in addition to those demands that were expected during this period (e.g., preparation and travel for depositions in three states). Defendant requests that the deadline for its Answering Brief be extended to July 12, 2024. Defendant requests this extension in good faith and not for the purposes of delay.

With the extension of the deadline for Defendant's Answering Brief, Plaintiff's Reply would be due on July 19, 2024. Plaintiff requests an additional week extension to July 26, 2024 to

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prepare and file her Reply Brief given the dispositive nature of the briefing and the existing
demands on her undersigned counsel's schedule. Plaintiff likewise makes this request in good faith
and not for purposes of delay.

DATED this 25th day of June, 2024.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Nicole G. True

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Attorneys for Defendant

IT IS SO ORDERED:

UNITED/STATES MAGISTRATE JUDGE

Dated: June 26, 2024